

Exhibit B

15-3135(L)

15-3151(XAP)

UNITED STATES COURT OF APPEALS
for the
SECOND CIRCUIT

MARK I. SOKOLOW, ET AL.

Plaintiffs-Appellants,

v.

PALESTINE LIBERATION ORGANIZATION, ET AL.,

Defendants-Appellees.

APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK IN 2004 CIV. 0397
HONORABLE GEORGE B. DANIELS

DECLARATION OF DAVID C. RUSSELL

David C. Russell hereby declares as follows:

1. I am associated with the firm of Arnold & Porter Kaye Scholer LLP, counsel for Plaintiffs in *Sokolow v. PLO*. I make this declaration to place certain facts before the Court.
2. I understand from published court decisions and the record in this case that the PLO and PA maintained an office in Washington, D.C. for many years.

3. According to Item 11 of Defendants' most recent FARA report, one service that Defendants' Washington, D.C. office provided was "Consular Services, such as Power of Attorney documents, Birth and Death certificates, and other forms." A copy of this FARA report, filed with the Department of Justice on October 9, 2018, is attached as Ex. A.

4. This report indicates that the Department of State ordered Defendants' Washington, D.C. office to be closed on October 10, 2018. Ex. A, Item 7.

5. In an October 11, 2018 radio interview, Hakam Takash, an employee in Defendants' Washington, D.C. office, described the consular services that the office provided, stating that they included services certifying documents for use in Palestinian legal proceedings. A transcription of that portion of the interview is attached as Ex. B.

6. According to an article published in the Arabic-language newspaper Al-Quds, when the D.C. office closed, the office announced on behalf of the PA's Ministry of Foreign Affairs and Expatriates that "the government of the State of Palestine will unequivocally honor its promises to its citizens living in the United States . . . and has stressed that it would find alternate ways of continuing to provide consular services, and guarantee the continued provision of services to citizens." A copy of the Al-Quds article, dated November 10, 2018, is attached as Ex. C.

7. Before the Washington, D.C. office closed, Defendants advertised on their “PLODelegation.org” website that the office provided consular services. A copy of the internet archive of the “consular affairs” section of the website “plodelegation.org” from September 10, 2018 is attached as Ex. D. That section listed a number of notaries as part of its consular-service offerings, among them Ahmad Alahmad, Samir Farhat, and Awni Abu Hdba. *Id.* In February 2019, I placed calls to these individuals.

8. I spoke with Mr. Alahmad on February 25 and asked him whether he was licensed to certify documents for use in Palestine. He said that he was. I then asked him whether he was willing to certify my certificate of admission from the U.S. District Court for the Southern District of New York (“admission certificate”) for use in Palestine. In response, he asked me to email him my admission certificate before he could give me an answer, which I did. Later in the day, he called me and left me a voicemail saying that he had referred my request to a person in Washington, D.C., who would contact me about certifying my admission certificate.

9. On February 27, 2019, Mr. Alahmad emailed me telling me to call him. When I called him back, he told me that his contact in Washington, D.C. was now unable to certify my admission certificate and that he would certify it instead.

Specifically, he told me that he would mail the admission certificate to either Canada or Mexico for certification.

10. I also spoke with Mr. Farhat on February 25 and asked him whether he was licensed to certify documents for use in Palestine. He said that he was. He then gave me the name of a person who I should contact in Paterson, New Jersey—Mr. Abu Hdba.

11. I spoke with Mr. Abu Hdba on February 26 and asked him whether he was licensed to certify documents for use in Palestine. He said that he was. I then asked him whether he was willing to certify my admission certificate for use in Palestine. In response, he asked me to email him my admission certificate, which he wanted to look at before giving me an answer. I then emailed him my admission certificate to the email address that he gave me.

12. Mr. Abu Hdba called me back later in the day and told me that he would provide the necessary certifications for my admission certificate. Specifically, he told me that he would send the admission certificate to Canada for certification.

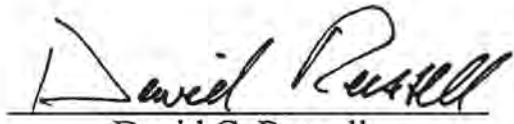
13. Mr. Abu Hdba then gave me an address in New Jersey to mail my admission certificate to. He also told me to include a \$300 money order—the fee for certifying the admission certificate.

14. I mailed Mr. Abu Hdba my admission certificate on February 26, 2019 to the address in New Jersey that he gave me, along with a \$300 money order. On February 27, 2019, FedEx delivered the admission certificate to that address. A copy of the proof of delivery is attached as Ex. E.

15. On March 11, 2019 I received my stamped admission certificate from Mr. Abu Hdba. A copy of the stamped admission certificate, along with the envelope that it came in indicating that it was mailed to me from New Jersey, is attached as Ex. F.

16. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 20, 2019



David C. Russell

Russell Decl. Ex. A

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement

Pursuant to the Foreign Agents Registration Act of 1938, as amended

For Six Month Period Ending Sep. 30, 2018

(Insert date)

I - REGISTRANT

1. (a) Name of Registrant

General Delegation of the PLO

(b) Registration No.

5244

(c) Business Address(es) of Registrant

1732 Wisconsin Ave., NW
Washington, DC 20007

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, AND 5(a).

3. If you have previously filed Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period.

Yes No

If yes, have you filed an amendment to the Exhibit C? Yes No

If no, please attach the required amendment.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Position	Date Connection Ended
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(b) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes No

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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5. (a) Has any person named in Item 4(b) rendered services directly in furtherance of the interests of any foreign principal?

Yes No

If yes, identify each such person and describe the service rendered.

(b) During this six month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes No

Name	Residence Address	Citizenship	Position	Date Assumed
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(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
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(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes No

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
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6. Have short form registration statements been filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement?

Yes No

If no, list names of persons who have not filed the required statement.

II - FOREIGN PRINCIPAL

7. Has your connection with any foreign principal ended during this 6 month reporting period? Yes No
If yes, furnish the following information:

Foreign Principal Date of Termination
The Palestinian Liberation Organization October 10, 2018
(The General Delegation of the PLO to the U.S. is been ordered to close the office by the State Department).

8. Have you acquired any new foreign principal(s)² during this 6 month reporting period? Yes No
If yes, furnish the following information:

Name and Address of Foreign Principal(s) Date Acquired

9. In addition to those named in Items 7 and 8, if any, list foreign principal(s)² whom you continued to represent during the 6 month reporting period.

The Palestinian Liberation Organization

10. (a) Have you filed exhibits for the newly acquired foreign principal(s), if any, listed in Item 8?

Exhibit A³ Yes No
Exhibit B⁴ Yes No

If no, please attach the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes No

If yes, have you filed an amendment to these exhibits? Yes No

If no, please attach the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, identify each foreign principal and describe in full detail your activities and services:

The General Delegation of the PLO acts as the official representative office of the PLO in the United States. The office assists Palestinians in the US with Consular Services, such as Power of Attorney documents, Birth and Death certificates, and other forms. The office also coordinates events for the community, pursues Public Diplomacy in the US, and interacts with members of the US Government, NGOs, and civil society to inform and educate on Palestinian issues.

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity⁵ as defined below? Yes No

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Please see attached schedule 1

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits your foreign principal(s)? Yes No

If yes, describe fully.

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

IV - FINANCIAL INFORMATION

14. (a) **RECEIPTS-MONIES**

During this 6 month reporting period, have you received from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes No

If no, explain why.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.⁶

Date	From Whom Please see attached schedule 2	Purpose	Amount	Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

During this 6 month reporting period, have you received, as part of a fundraising campaign⁷, any money on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

If yes, have you filed an Exhibit D⁸ to your registration? Yes No

If yes, indicate the date the Exhibit D was filed. Date _____

(c) **RECEIPTS-THINGS OF VALUE**

During this 6 month reporting period, have you received any thing of value⁹ other than money from any foreign principal named in Items 7, 8, or 9 of this statement, or from any other source, for or in the interests of any such foreign principal?

Yes No

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose

6, 7 A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. (See Rule 201(e)).

8 An Exhibit D, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal.

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

(PAGE 6)

15. (a) **DISBURSEMENTS-MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement? Yes No

(2) transmitted monies to any such foreign principal? Yes No

If no, explain in full detail why there were no disbursements made on behalf of any foreign principal.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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Please see attached schedule 2A

Total

(PAGE 7)

(b) **DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, have you disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes No

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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(c) **DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes No

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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^{10, 11} Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

(PAGE 8)

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any informational materials?¹²

Yes No

If Yes, go to Item 17.

(b) If you answered No to Item 16(a), do you disseminate any material in connection with your registration?

Yes No

If Yes, please forward the materials disseminated during the six month period to the Registration Unit for review.

17. Identify each such foreign principal.

N/A

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating informational materials? Yes No

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of informational materials include the use of any of the following:

Radio or TV broadcasts Magazine or newspaper Motion picture films Letters or telegrams
 Advertising campaigns Press releases Pamphlets or other publications Lectures or speeches
 Other (specify) _____

Electronic Communications

Email
 Website URL(s): www.plodelegation.us
 Social media websites URL(s): <https://www.facebook.com/PalestineInUSA/> <https://twitter.com/PalestineUSA>
 Other (specify) _____

20. During this 6 month reporting period, did you disseminate or cause to be disseminated informational materials among any of the following groups:

Public officials Newspapers Libraries
 Legislators Editors Educational institutions
 Government agencies Civic groups or associations Nationality groups
 Other (specify) N/A

21. What language was used in the informational materials:

English Other (specify) Arabic

22. Did you file with the Registration Unit, U.S. Department of Justice a copy of each item of such informational materials disseminated or caused to be disseminated during this 6 month reporting period? Yes No

23. Did you label each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes No

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature¹³)

October 05, 2018

/s/ Dr. Husam Zomlot

eSigned

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

Registration Number 5244

Six months period ending September 30, 2018

Schedule (1)

(No Transcript)

Sunday, April 1, 2018

Monday, April 2, 2018

3:30 p.m. Suzan Qariot and May Barghouthi/office

Tuesday, April 3, 2018

3:00 p.m. Meeting with Dr. Norbert Goldfield/office

Wednesday, April 4, 2018

10:00 a.m. Interview at CBS News

1:15-2:30 p.m. Speech at Brookings

1775 Massachusetts Ave NW, Washington, DC 20036

Thursday, April 5, 2018

11:00 a.m. Breakfast with CNN Editorial Board

820 First Street, NE, Suite 1100

5:00-6:00 p.m. Model Arab League w/ NCUSAR Student Briefing

3900 Reservoir Rd. NW, Washington, DC 20057 (Georgetown University Hotel and Conference Center)

Friday, April 6, 2018

11:30 a.m. Francesco FONTENAGGI from AFP/office

5:00 p.m. Meeting with Elise from CNN

Sunday, April 8, 2018

2:30 p.m. PLO Office Easter Event

Religious Society of Friends

2111 Florida Ave NW, Washington, DC 20008

Monday, April 9, 2018

2:30 p.m. Martine Sherman/office

Tuesday, April 10, 2018

4:00 p.m. Washington Report Meeting

Middle East Books and More

1902 18th St NW

Washington, DC 20009

Wednesday, April 11, 2018

1:30 p.m. Phone call with Rev. Dr. Mae Cannon

Thursday, April 12, 2018

Princeton University

Friday, April 13, 2018

2:00-3:00 p.m. A private roundtable with H. E. Sheikh Mohammed Al Thani, Deputy Prime Minister and Minister of Foreign Affairs
Brookings Institution
1775 Massachusetts Ave NW, Washington, DC 20036

Monday, April 16, 2018

10:00 a.m. Meeting with Rabbis at J-Street Conference
Omni Shoreham Hotel
2500 Calvert St NW, Washington, DC 20008

1:40 p.m. Speech at J-Street Conference
Omni Shoreham Hotel
2500 Calvert St NW, Washington, DC 20008

3:30 p.m. J-Street U
Omni Shoreham Hotel
2500 Calvert St NW, Washington, DC 20008

6:30 p.m. J-Street Gala
Omni Shoreham Hotel
2500 Calvert St NW, Washington, DC 20008

Tuesday, April 17, 2018

10:30-12:00 Evangelical Leaders Meeting
110 Maryland Ave NE, Room 103
Washington DC, 20002

2:30 p.m. Students from Washington Workshop Foundation/office

Wednesday, April 18, 2018

11:00 a.m. Arab Ambassadors' Meeting
Arab League

6:00 p.m. Meeting with Governor Azzam Shawwa
Intercontinental Hotel (the Wharf)
801 Wharf Street, SW, Washington, DC 20024

Thursday, April 19, 2018

3:30 p.m. Meeting with Lara Friedman and Daniel Beiman/office

Friday, April 20, 2018

12:00 p.m. Hadeel Oueis, Al-Riyadh Newspaper/office

Monday, April 23, 2018

11:00 a.m. Minister Dr. Shukri Bishara/office

12:00 p.m. Governor Azzam Shawwa/office

4:30 p.m. Meeting with Ambassador Tor Wennesland
Dupont Circle Hotel
1500 New Hampshire Avenue NW
Washington DC, 20036

Tuesday, April 24, 2018

11:00 a.m. Meeting with Senator Lindsey Graham (US-Palestinian Relations)
Russell Senate Office Building

Wednesday, April 25, 2018

12:00 p.m. Lunch at Mr. Chuck McLeod's house
3:00 p.m. Grace and the group/office

Thursday, April 26, 2018

5:30 p.m. AAI Gala (Mr. & Mrs.)
J.W. Marriott
1331 Pennsylvania Ave., NW (Black tie)

Friday, April 27, 2018

10:00 a.m. Meeting with Professor Khalidi/office

Friday, May 11, 2018

11:15 a.m. USMEP International Board Meeting
St. Regis Hotel
923 16th & K Street, NW

Saturday, May 12, 2018

Sunday, May 13, 2018

5:00 p.m. Interview with MSNBC

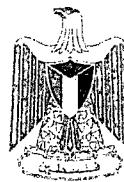
Monday, May 14, 2018

10:00 a.m. Interview with CNN
820 First St NE, Washington, DC 20002
(must be there at 9:45 a.m.)
12:30 p.m. Interview with Emilio Bos Swiss Radio/office
1:30 p.m. Interview with Alarabya/office
3:00 p.m. Al-jazeera English
1200 New Hampshire Ave., NW (must be there at 2:50)
6:00 p.m. Interview with CNN
820 First St NE, Washington, DC 20002

Tuesday, May 15, 2018

**General Delegation of the PLO
to the United States**

1732 Wisconsin Ave., NW Washington, DC 20007
Tel: (202) 974-6360 • Fax: (202) 974-6278



المفوضية العامة
لمنظمة التحرير الفلسطينية
الولايات المتحدة - واشنطن
هاتف: 202-974-6260 • فاكس: 202-974-6278

Schedule No.2

Registration Number 5244

Receipts & Expenditures

Six Month Period Ending September 30, 2018

Receipt:

- Balance of cash in Abu Dhabi International Bank as of March 31, 2018	\$31,887.52
- Received from Palestine National Found / Amman:	\$221,338.00
- Refund value of Attorney of Power (Proxies Certification):	\$154,850.00
- Refund (Personals& Others):	\$20,320.00
- Refund (Bank Interests):	\$305.17

Total receipts and balance on hand:

\$828,747.43

Expenditures:

Total Expenditures (Schedule No. 2A)

\$827,819.02

Reconciliation:

Balance in bank as of September 30, 2018:

\$928.41

- Total balance of three accounts we have at Bank Abu Dhabi International Bank located at: 1430 K Street, NW, Washington, DC 20005 as of September 30, 2018:

Account# 1100008370 for the amount of \$928.41
Account# 1105385400 for the amount of \$ 0.00
Account# 1100006026 for the amount of \$ 0.00

**General Delegation of the PLO
to the United States**

1732 Wisconsin Ave., NW, Washington, DC 20007
Tel: (202) 974-6360 • Fax: (202) 974-6278



**المفوضية العامة
لمنظمة التحرير الفلسطينية**
الولايات المتحدة - واشنطن
هاتف: ٩٧٤-٦٣٦٠ • فاكس: ٩٧٤-٦٢٧٨ (٢٠٢)

Schedule No.2A

Other Expenses

Six Month Period Ending September 30, 2018

- Office (Rent):	\$ 0.00
- Office utilities (Water, Electricity, Gas):	\$ 7,231.42
- Employees Residential (Rent):	\$123,780.00
- Employees Residential (Water, Electricity, Gas, Cable):	\$ 2,847.20
- Salaries (Local Employees):	\$227,789.00
- Telephone, Mailing & Shipping:	\$ 11,334.25
- Subscriptions (Newspaper, Magazines, CQ Roll Call):	\$ 1,150.00
- Equipment Purchase:	\$ 0.00
- Furniture Purchased for Residential:	\$ 0.00
- Equipment Maintenance:	\$ 390.00
- Stationary & Supplies:	\$ 880.65
- Entertainment (Luncheon Invitations & Receptions):	\$ 17,726.25
- Cars (Gas, Insurance, Maintenance, Property Tax):	\$ 2,050.75
- Travel Tasks (Airline Tickets & Lodging):	\$ 18,317.00
- Employees Health Insurance & Medical Expenses:	\$ 0.00
- Employees Schools tuition fees:	\$ 0.00
- Employees end of service (severance):	\$384,221.00
- Miscellaneous expenses (Transportations, Parking, Over time, Reimbursements & Financial allowances, Property Insurance):	\$ 30,101.50
Total expenses:	\$827,819.02

Russell Decl. Ex. B

Transcription of KPFA Radio Interview

Letters and Politics: 10.11.18 - 10:00 AM

7:50 to 13:00:

Hakam Takash: Um, but a large part of our work was what I did, the consular work. So, you know, there was, there was phone calls between the White House and the ambassador every time the delegation, the Palestinian delegation would come to the U.S., you know, our ambassador would accompany them to the meetings and so on. But I've been there for 18 years doing the, sort of, the, you know, what many people view as the secondary work, which is the consular work. But after they closed down the office, it seems to me, that the thing that'll be missed the most is really my work. Um, the contact between officials, I think can carry on without an embassy but actual people on the ground that need services, and we're talking here services from every walk of life. I mean, we're handling about half a million Palestinians in the U.S. I process around 3,600 applications a year, um, and-

Mitch Jeserich: Applications for what?

Hakam Takash: For everything you can imagine. From, you know, Exxon Mobil trying to protect their copyrights in the West Bank, to folks coming over to the U.S. with kids that need their birth certificates certified so they can use them in American elementary schools, so on. It's every walk of life. Basically, paperwork that's produced in the U.S. that needs to be used in Palestine comes to my office and paperwork that's produced in Palestine that needs to be used in America comes through my office as well. So you really see humanity walk in and out of the door. You see the sort of processes of life. Um, it's a different perspective, it gives me a different perspective on conflict and it gives me a different perspective on people.

Mitch Jeserich: So Hakam, tell me who you end up providing services for, and I want to get to businesses in a moment because that's important, businesses, uh, that do business, uh, in Palestine. But for people as well, do you, is it Palestinians who are in the United States that you provide services for? Is it Palestinian Americans who also have citizenship here, uh, in the United States? Tell me about exactly who's gonna be affected by this.

Hakam Takash: So, I think it's about, maybe 70% of the work I do is for Palestinian Americans. Maybe 30% of it is for Palestinians without American citizenship. But then, I'll also remind you, that a lot of the people that call me aren't even Palestinian Americans. They're, you know, the spouses of a Palestinian American, they're the children of a Palestinian American,

they're friends and loved ones of it, so, as long as there's Palestinians in the U.S. they'll have a network of relationships that sometimes they'll have to call the Palestinian office for.

Mitch Jeserich: And now that that just doesn't exist, if somebody, could you basically, I mean it was a consulate basically, but I guess it wasn't officially a consulate.

Hakam Takash: Um, yes, it-

Mitch Jeserich: Or was it?

Hakam Takash: We had all the responsibilities of a consulate but we were never allowed the, let's say the privileges of a consulate. So for example, a real consulate would have a diplomatic pouch that we could use to send say passports for renewal, or, you know, classified documents, court documents, and so on to Palestine, we did not have that privilege. But, we were always expected, by the U.S. government, mind you, to do these, you know, to offer, to provide these services. And, I always like to tell people that, it was my stamp that, the stamp from this PLO consulate, was recognized by all the parties involved in the conflict. So, the U.S. government would ask people to go to my office to get something certified. Obviously, the Palestinian Authority would ask people to get stuff certified from my office. But then, Hamas in Gaza would ask people to come to my office and get certified, and so would the Israelis, sometimes. They would ask people to go to the Washington office and get things certified. Um, so all the parties involved in this wanted Hakam to actually process, they believed in my stamp, they said if this is signed by the office of the PLO in Washington, we will recognize this as a true and original document.

Mitch Jeserich: And certified, I mean, what would people have to get certified? I know you said all kinds of things that people need certification for, are we talking about travel, are we talking about, and what are we talking about?

Hakam Takash: I mean, in the simplest form, I'm here because I understand the legal system in both places. So, if there's, you know, a divorce document in the U.S., if you were to send it directly to Palestine, the Palestinian legal system would look at it and say, "I don't know what this document is, I don't know if it's legal or not, I need somebody on the ground over there to tell me that this divorce decree is correct." And so, I would come in and certify that this is true and correct. And then vice versa. So, the U.S. government would say "I don't know if these Palestinian documents are real or if this person is making them up, go to your embassy and have them certify that this is a true Palestinian document." And so they'd bring it to me. So, I mean, it's such a large bag of things that come through my

office, it's really hard to count them all, and how much time do you have?

Mitch Jeserich: We have about 15 more minutes.

Arnold & Porter

CERTIFICATION

I, Daniella Naaman, hereby certify that the foregoing is a true and correct transcription, to the best of my ability, of a portion of the following portion interview—Letters and Politics, *The Closing of the Palestinian Office in Washington. Then, The Canonization of Salvadoran Archbishop Romero*, KPFA (Oct. 11, 2018, 10:00 AM), <https://kpfa.org/episode/letters-and-politics-october-11-2018/>.

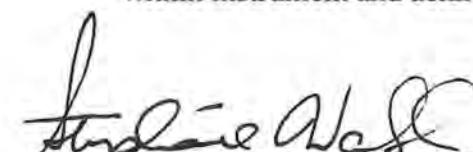
In witness whereof, I hereby sign this date: March 14, 2019.



Daniella Naaman

STATE OF NEW YORK)
COUNTY OF NEW YORK) :SS:

On the 14th day of March, 2019, before me, the
undersigned notary public, personally appeared Daniella Naaman,
personally known to me to be the individual whose name is subscribed to the
within instrument and acknowledged to me that she executed the same



Notary Public

STEPHANIE L. WALSH
Notary Public, State of New York
No. 01WA6264160
Qualified in Queens County
Certificate Filed in New York County
Commission Expires 6/25/20

Russell Decl. Ex. C

PLO's General Delegation to the United State to Close its Doors

Nov. 10, 2018 | 08:16 AM

Said Erekat

Washington D.C. - www.alquds.com.



The Palestine Liberation Organization has closed the offices of its mission to the US capitol in Washington D.C. A large crowd comprised of representatives of Palestinian-American organizations and organizations that identify with the Palestinian cause, including a number of progressive Jewish-American organizations, as well as dozens of journalists, gathered outside of the building in Washington D.C.'s Georgetown neighborhood, expressing their feelings of solidarity with the Palestinian struggle for freedom, the end to occupation, and the right of return.

The mission made an announcement in front of the demonstrators and the media, stating on behalf of the Ministry of Foreign Affairs and Expatriates that the diplomatic staff of the PLO's General Delegation to the United States "had completed all of their duties in the United States, as part of a step taken following an antagonistic and arbitrary decision made by the American administration to close the Palestine Liberation Organization's General Delegation, which means cutting off the diplomatic and political relations between the governments of the two countries".

The announcement added that "the ministry has stated that the government of the State of Palestine will unequivocally honor its promises to its citizens living in the United States by taking all necessary steps to prevent this decision from affecting or impeding their interests, and has stressed that it would find alternate ways of continuing to provide consular services, and guarantee the continued provision of services to citizens and the safeguarding of their interests." It stressed that diplomatic relations based on mutual respect are the cornerstone of dialog and cooperation between nations and peoples, and this has been the international custom in practice for hundreds of years.

The announcement mentioned that ineffective, antagonistic and aggressive policies and actions of the current U.S. administration, which are based on dictating and imposing negotiations instead of cooperation, are what the American administration had done, and this prevents it from playing any role in the political process that we eagerly await in order to achieve justice and a lasting peace, in accordance with international law, because the American administration cannot continue acting as an intermediary when its actions reflect injustice and aggression."

The announcement concluded with the following statement: "The harmful American policies will not overshadow the strong bonds between the Palestinian people and those who defend peace and cooperation in the United States. We will continue working tirelessly to deepen the ties between the two nations with a common commitment to the values of freedom and dignity for all nations. The Palestinian people holds the generous and benevolent American people in high regard, a people who has continuously supported our people's just struggle to preserve its dignity, oppose a discriminative and racist regime, and fight to take back its liberty from the clutches of a foreign and colonial occupation."

In turn, Robert Palladino, the spokesperson for the U.S. State Department, later responded to a question he was asked by Al-Quds, regarding whether his government wishes to reopen the Palestinian office and restart the diplomatic exchange with the Palestinians.

He said that his government "has not seen anything that would change its position since deciding to close the office on the 10th of September, 2018, giving the mission 30 days to vacate the building".

Those who came to express their solidarity with the Palestinian cause were overtaken by emotion as Hakam Takash, the Palestinian consul, removed the plaque that reads "the General Delegation of the Palestine Liberation Organization to the United States", which stated the identity of the mission, from the facade of the building. Playing in the background was the song "I will hold with my back held

straight", composed by the musician Marcel Khalife, with lyrics by the late Palestinian poet Samih al-Qasem.

As the mission closed, the Palestinian flag continuing fluttering above, and Riyad al-Maliki, the minister of foreign affairs and expatriates, exclaimed: "Although the office will no longer serve as the headquarters for the Palestinian mission, after it is closed and its contents emptied, all we will do is remove the plaque from the entranceway, which stated that the office of the mission of the Palestine Liberation Organization is here. However, the flag will remain where it is, considering that the building is private property, not government property, and the owner of the property may fly any flag he wishes, unless the government orders him to remove it. Palestinian arms shall never remove any Palestinian flag, those very arms that had toiled to raise the flag everywhere, something they had paid a price for."

The Palestinian flag was officially raised above the building housing the mission on the 19th of January, 2011.

The official spokeswoman for the U.S. State Department, Heather Nauert, had issued an announcement on the 10th of September 2018, regarding the closure of the General Delegation of the Palestine Liberation Organization in the American capital.

This announcement stated that "The Administration has determined after careful review that the office of the General Delegation of the Palestine Liberation Organization in Washington should close. We have permitted the Palestine Liberation Organization office to conduct operations that support the objective of achieving a lasting, comprehensive peace between the Israelis and the Palestinians since the expiration of a previous waiver in November 2017. However, the Palestine Liberation Organization has not taken steps to advance the start of direct and meaningful negotiations with Israel. To the contrary, the Palestine Liberation Organization leadership has condemned a U.S. peace plan they have not yet seen and refused to engage with the U.S. government with respect to peace efforts and otherwise. As such, and reflecting Congressional concerns, the Administration has decided that the Palestine Liberation Organization office in Washington will close at this point". In her announcement, Nauert shed light on the decision, saying: "This decision is also consistent with Administration and Congressional concerns with Palestinian attempts to prompt an investigation of Israel by the International Criminal Court."

Nauert told Al-Quds that "The United States continues to believe that direct negotiations between the two parties are the only way forward. This action should not be exploited by those who seek to act as spoilers (of the peace process) to distract from the imperative of reaching a peace agreement. We are not retreating from our efforts to achieve a lasting and comprehensive peace."

It should be noted that the Palestinian ambassador in Washington, D.C. was recalled by Palestinian President Mahmoud Abbas on the 15th of May, 2018, in protest of the transfer of the U.S. embassy from Tel Aviv to occupied Jerusalem, and he has not returned to the U.S. capital since that time.

Palestinian-U.S. relations have noticeably soured since the 10th of September, 2018.



I, Yaniv Berman, declare pursuant to 28 U.S.C. §1746, as follows:

1. I am a professional translator with an M.A. degree in Middle Eastern Studies from the Hebrew University of Jerusalem (Israel). I read Arabic and English fluently, and I am capable of translating accurately between Arabic and English.
2. The English-language text above is a full and accurate translation of the Arabic-language document below.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on: March 12, 2019



Yaniv Berman

مفوضية منظمة التحرير الفلسطينية في واشنطن تغلق أبوابها



08:16 | 11-10-2018



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واشنطن، - "القدس". دهت كهم - سعد عينات - أغلقت منظمة التحرير الفلسطينية مكاتب بعثتها في ، العاصمة الأمريكية واشنطن.



بكلمات تضامنية مع نضال الفلسطينيين من أجل الحرية وإنهاء الاحتلال وحق العودة.

وقالت البعثة في بيان لها أمام المتظاهرين والصحافة أن وزارة الخارجية والمغتربين الفلسطينية أذن الموظفين الدبلوماسيين في المفوضية العامة لمنظمة التحرير الفلسطينية لدى الولايات المتحدة، "قد أنهوا كافة أعمالهم في الولايات المتحدة، في خطوة تأتي في أعقاب القرار العدائي والتعسفي للإدارة الأمريكية والقاضي بإغلاق المفوضية العامة لمنظمة التحرير الفلسطينية، بما يعني قطع العلاقات الدبلوماسية والسياسية بين حكومتي البلدين."

وأضاف البيان "كما وأكدت الوزارة أن حكومة دولة فلسطين ستحافظ على وعودها القاطعة لمواطنيها المقيمين في الولايات المتحدة باتخاذ كافة الإجراءات الالزمة كي لا تتعطل مصالحهم أو تتأثر بهذا القرار، وشددت أنها ستتجدد الطرق البديلة لمواصلة تقديم الخدمات القنصلية وضمان استمرار خدمة المواطن وحماية مصالحه" مشددة أن العلاقات الدبلوماسية القائمة على الاحترام المتبادل هي حجر الزاوية في الحوار والتعاون بين الأمم والشعوب، وهو الأمر المعمول به في الأعراف الدولية منذ مئات السنين. وأشارت إلى أن السياسات والأفعال الهجومية والعدائية، غير الناجعة للإدارة الأمريكية الحالية، والقائمة على الامتلاءات وفرض التفاوض بدلًا عن التعاون، هو ما يقصي الإدارة الأمريكية ويبعدها عن أي دور في العملية السياسية، التي نتطلع إليها لتحقيق العدل والسلام الدائم تماشيا مع القوانين الدولية، إذ لا يمكن أن تستمر الإدارة الأمريكية في لعب دور الوسيط في الوقت الذي تعكس أفعالها إجحافا وعدائية.

وفي الختام، أكد البيان أن "السياسات الأمريكية الضارة لن تلقي بظلالها على العلاقات القوية بين الشعب الفلسطيني والمدافعين عن السلام والتعاون في الولايات المتحدة ، وشددت أنها ستواصل العمل الدؤوب من أجل تعميق الروابط بين الشعبين مع الدلitzam المشترك بقيم الحرية والكرامة لجميع الشعوب". وأضافت أن الشعب الفلسطيني يقدر عاليًا الشعب الأمريكي الطيب والصحي بدعمه المتواصل لنضال شعبنا المشروع في الحفاظ على الكرامة وانتزاع حرية من براثن الاحتلال الأجنبي الاستعماري ونظام التمييز العنصري .

بدوره قال روبرت باديللو ، الناطق باسم وزارة الخارجية الأمريكية ردا على سؤال وجهته له "القدس" عما إذا كانت حكومته ترغب في إعادة فتح المكتب الفلسطيني واستئناف التبادل الدبلوماسي مع الفلسطينيين؟

وقال "أن حكومته لم ترى ما يغير وجهة نظرها منذ اتخاذها قرار إغلاق المكتب يوم 10 أيلول 2018 والذي منح البعثة مدة 30 يوما لإنخلاء البقبة".

وسيطرت العواطف الجياشة على الحاضرين المتضامنين مع القضية الفلسطينية عندما خلع القنصل الفلسطيني حكم طفشن اللوحة التي تعرف "المفوضية العامة لمنظمة التحرير الفلسطينية" التي تشير إلى هوية البعثة من على الحائط الأمامي للعمارة على أنغام أغنية "منتصب القامة أمشي" للفنان مرسيل خليفة وكلمات الشاعر الفلسطيني الراحل سميح القاسم.

وفيمما أقفلت البعثة، ظل العلم الفلسطيني يرفرف عاليًا حيث صرخ أ وزير الخارجية والمغتربين رياض المالكي "رغم أن المكتب لم يعد رسميا مقرًا لبعثة فلسطين، بعد أن تم إغلاقه وتفرغ محتوياته، وكل ما سنعمله هو خلع اللوحة على المدخل التي تشير أن هنا يقع مكتب بعثة منظمة التحرير الفلسطينية. أما العلم فيبقى حيث هو، على اعتبار أن العمارة هي ملك خاص، وليس ملك حكومي، ويستطيع صاحب الملك أن يرفع أي علم يريد، إلا إذا أخبرته الدولة على إنزاله" مؤكدا "إن السواعد الفلسطينية لن تنزل أي علم فلسطيني، تلك السواعد التي دأبت على رفعه في كل مكان ودفعت أثماناً لذلك".

وكان العلم الفلسطيني قد رفع رسميا على مبني البعثة يوم 19 كانون الثاني 2011.

وكانت الناطقة الرسمية باسم وزارة الخارجية الأمريكية هيلز ناورت قد أصدرت بيانا يوم 10 أيلول 2018 أعلنت فيه إغلاق مكتب مفوضية منظمة التحرير الفلسطينية في العاصمة الأمريكية.

وقال البيان المذكور "قد قررت الإدارة بعد مراجعة دقيقة أن يغلق مكتب البعثة العامة لمنظمة التحرير الفلسطينية في واشنطن. لقد سمحنا لمكتب منظمة التحرير الفلسطينية بالقيام بعمليات تدعم هدف تحقيق سلام دائم وشامل بين الإسرائيليين والفلسطينيين منذ انتهاء التنازل السابق في شهر تشرين الثاني 2017. ومع ذلك ، لم تتخذ منظمة التحرير الفلسطينية الخطوات

اللزمة لبدء تقديم مباشر، ومفاوضات هادفة مع إسرائيل". وأضاف بيان الوزارة "على العكس ، أدانت قيادة منظمة التحرير الفلسطينية خطة سلام أميركية لم ترها بعد ورفضت الدنخراط مع الحكومة الأميركيّة فيما يتعلق بجهود السلام وغيرها. وعلى هذا الأساس، وتماشياً مع مخاوف الكونغرس ، قررت الإدارة أن مكتب منظمة التحرير الفلسطينية في واشنطن سيغلق في هذه المرحلة". وسلطت ناورت الضوء في بيانها على أنه "ينسجم هذا القرار أيضاً مع قلق الإدارة والكونغرس بشأن المحاولات الفلسطينية الرامية إلى إجراء تحقيق في إسرائيل من قبل المحكمة الجنائية الدوليّة".

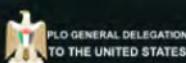
وأكّدت ناورت للقدس أنه "ما زالت الولايات المتحدة تعتقد أن المفاوضات المباشرة بين الطرفين هي الطريق الوحيدة للتقدّم، لا ينفي استغلال هذا الإجراء من قبل أولئك الذين يسعون إلى العمل كمفاسدين (العملية السلام) ، لصرف الانتباه عن ضرورة التوصل إلى اتفاق سلام، إننا لا نتراجع (باتخاذ هذه الخطوة) عن جهودنا لتحقيق سلام دائم وشامل".

يجدر بالذكر أن السفير الفلسطيني في واشنطن كان قد استدعي من قبل الرئيس الفلسطيني محمود عباس يوم 15 أيار 2018 الماضي احتجاجاً على نقل السفارة الأميركيّة من تل أبيب إلى القدس المحتلة ، ولم يعد للعاصمة الأميركيّة منذ ذلك الوقت.

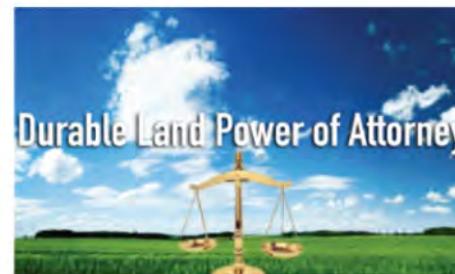
وقد ساءت العلاقات الفلسطينيّة الأميركيّة بشكل ملحوظ منذ العاشر من أيلول 2018 وحتى اليوم.



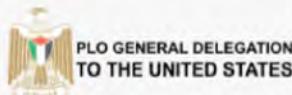
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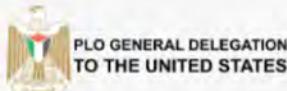
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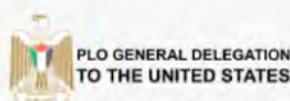
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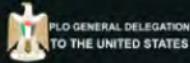
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NGO and Corporate

Instructions and applicable fees for certifying documents



Internal Revenue Service Letter:

- This letter outlines 501(c) institution statuses and is only required for nonprofit registration. For-profit corporations must certify the last year's financial statement as provided by Certified Public Accountants.
 - Clear and legible copies of this document are acceptable.
 - Document processing fees: \$100 for nonprofits; \$200 for for-profits

Letter of Intent and Agency:

- A letter signed by an authorized official or a board resolution, stating the institution's intent to conduct business in the Palestinian Territories and authorizing an agent or a representative to conduct the institution's affairs, including the completion of the registration process.
 - This document must be notarized by a notary public and certified by the Secretary of the relevant State as well as the Department of State in Washington D.C.
 - Processing fees for this document are: \$100 for Nonprofit organizations, and \$200 for a For-Profit organization.

Articles of Incorporation:

- This is a document produced by the State and shows that the organization was appropriately registered.
 - Copies of the Articles of Incorporation on file with the State registration agency are acceptable if issued by the relevant State registration agency.
 - Copies from corporate files are acceptable if notarized as true original copies and certified by the Secretary of the relevant State as well as the Department of State in Washington D.C.
 - Processing fees for this document are: \$100 for Nonprofit organizations, and \$200 for a For-Profit organization.

Bylaws:

- These are the internal laws that govern the institution. Contents of the bylaws may include the date of the fiscal year of the institution, the institutions mission statement, board meeting frequency, voting quorum etc.
 - Copies of the bylaws on file with the State registration agency are acceptable if issued by the relevant State agency
 - Copies from corporate files are acceptable if notarized as true original copies and certified by the secretary of the relevant state as well as the Department of State in Washington D.C.
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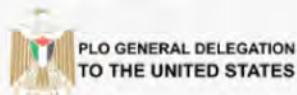
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- This is a document produced by the State and shows that the organization was appropriately registered.
 - Copies of the Articles of Incorporation on file with the State registration agency are acceptable if issued by the relevant State registration agency.
 - Copies from corporate files are acceptable if notarized as true original copies and certified by the Secretary of the relevant State as well as the Department of State in Washington D.C.
 - Processing fees for this document are: \$100 for Nonprofit organizations, and \$200 for a For-Profit organization.

Bylaws:

- These are the internal laws that govern the institution. Contents of the bylaws may include the date of the fiscal year of the institution, the institutions mission statement, board meeting frequency, voting quorum etc.
 - Copies of the bylaws on file with the State registration agency are acceptable if issued by the relevant State agency
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Latest News

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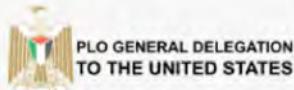


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To certify a passport Powers of Attorney please follow these instructions:

- Print and fill out the Power of Attorney form.
- Sign the documents in front of Notary Public
- Send 4 pictures with blue color background
- Send money order of \$50 payable to CASH
- Mail to the following address: The General Delegation of the PLO to the United States, 1732 Wisconsin Avenue NW, Washington D.C., 20007
- To ensure speedy delivery include express mail envelope with your address and stamps
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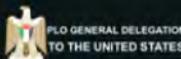
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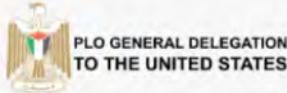
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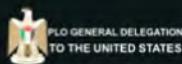
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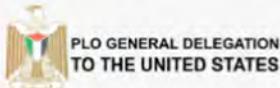
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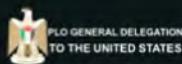
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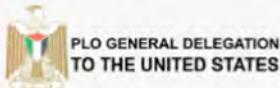


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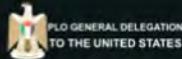
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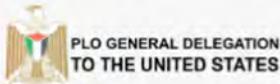


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24 July 2018

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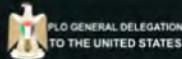
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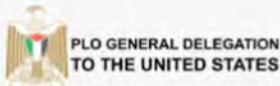
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Consular Affairs

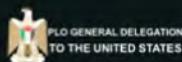
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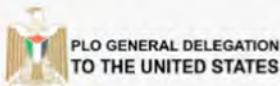
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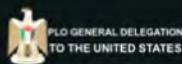
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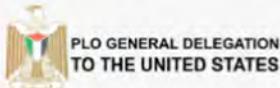
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DAVID CHARLES RUSSELL

was duly admitted and qualified to practice as an Attorney in the District Court
on the 6th day of November, 2018

In testimony whereof, I sign my name and affix the seal of the
Court, on this 6th day of November, 2018

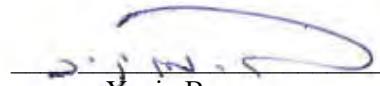


Ruby J. Krajick
Clerk

I, Yaniv Berman, declare pursuant to 28 U.S.C. §1746, as follows:

1. I am a professional translator with an M.A. degree in Middle Eastern Studies from the Hebrew University of Jerusalem (Israel). I read Arabic and English fluently, and I am capable of translating accurately between Arabic and English.
2. The following page contains an accurate translation into English of the Arabic text in the stamps on the foregoing document, to the extent it is legible.
3. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

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